

EXHIBIT B

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Fax Number:

Telephone Number:

415-522-3415

To: Roberta Steele, Regional Attorney

Company: EEOC San Francisco District Office

From: Shannon Liss-Riordan, Esq.

Date: 12/7/2022 Total Pages Including Cover Sheet: 4

Client Name: Willow Wren Turkal

Comments:

☐ URGENT☐ FOR REVIEW☐ PLEASE COMMENT☐ PLEASE REPLY

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December 7, 2022

VIA FACSIMILE

Roberta Steele, Regional Attorney
EEOC San Francisco District Office
450 Golden Gate Avenue
5 West, P.O. Box 36025
San Francisco, CA 94102-3661
FAX: 415-522-3415

Dear Ms. Steele:

Our firm represents Ms. Willow Wren Turkal in her class action Charge of Discrimination against Twitter, Inc. ("Twitter"). As described in the enclosed charge, Ms. Turkal alleges that Twitter has discriminated against her and other workers on the basis of sex.

We are also requesting that the EEOC cross-file this Charge of Discrimination with the California Department of Fair Employment and Housing.

We request that both the EEOC and the California Department of Fair Employment and Housing issue notices of right to sue immediately. Simultaneously with the submission of this Charge, we are filing a lawsuit on Ms. Turkal's behalf in order to seek emergency relief to prevent Twitter from obtaining severance agreements that contain full releases from the individuals who have suffered sex discrimination in Twitter's mass layoffs.

Your attention to this matter is appreciated.

Sincerely,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan

EEOC Form 5 (5/01)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.

Charge Presented to: Agency(ies) Charge No(s):

☒ FEPA
☒ EEOCCalifornia Department of Fair Employment and Housing and EEOC

State or local Agency, if any

Name (indicate Mr. Ms. Mrs.)

Home Phone (Incl. Area Code)

Date of Birth

Ms. Willow Wren Turkal

617-994-5800

Street Address

City, State and ZIP Code

[REDACTED] San Jose CA 95128, c/o Shannon Liss-Riordan, Lichten & Liss-Riordan, P.C., 729
Boylston Street, Suite 2000, Boston, MA 02116

Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)

Name

No. Employees, Members
More than 5,000Phone No. (Include Area Code)
866-924-2008

Twitter, Inc.

Street Address

City, State and ZIP Code

1355 Market Street, San Francisco, CA 94103

DISCRIMINATION BASED ON (Check appropriate box(es).)

☐ RACE ☐ COLOR ☒ SEX ☐ RELIGION ☐ NATIONAL ORIGIN☐ RETALIATION ☐ AGE ☐ DISABILITY ☐ OTHER (Specify below.)

DATE(S) DISCRIMINATION TOOK PLACE

Earliest

Latest

November 4, 2022

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attached extra sheet(s)):

Following a recent acquisition by Elon Musk, Twitter began laying thousands of employees off in a companywide mass layoff. On November 4, 2022, Twitter gave me notice that I would be laid off, effective January 2023. Elon Musk was personally involved in the process for choosing employees for layoff, which was widely reported to be ad hoc and chaotic and with little if any regard for employees' performance, abilities, and experience. Indeed, the layoffs proportionally affected a far higher proportion of women than men, to a highly statistically significant degree. This result is not surprising, as Elon Musk is widely known for his demeaning and hostile comments about women. Elon Musk has also implemented policies since his acquisition of Twitter that have had the effect (I believe intended effect) of resulting in more women than men leaving the company, through forced resignations, as well as terminations and layoffs. These policies include demanding unreasonable work hours (including encouraging employees to work 12 hour days for 7 days a week, sleeping in the office, and working out of physical offices), which is likely to have a disproportionate impact on women, who are more often caregivers for children and other family members, and thus not able to comply with such demands. I hereby assert a class claim of sex discrimination against Twitter under Title VII for female Twitter employees across the country, and under the California Fair Employment and Housing Act (FEHA) for female Twitter employees in California.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY – When necessary for State and Local Agency Requirements

I declare under penalty of perjury that the above is true and correct.

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

12/07/2022



Date

Charging Party Signature

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE
(month, day, year)

LICHTEN & LISS-RIORDAN, LLP

The Labor, Employment & Class Action Specialists

signNow**Document History**

SignNow E-Signature Audit Log

All dates expressed in MM/DD/YYYY (US)

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SignNow Web Application	Uploaded the Document	lichtenlissriordan@llrlaw.com	12/08/2022 02:32:12 am UTC	12/08/2022 02:32:07 am UTC	73.68.107.230
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SignNow Web Application	Document Saved	lichtenlissriordan@llrlaw.com	12/08/2022 02:33:08 am UTC	12/08/2022 02:33:08 am UTC	73.68.107.230
SignNow Web Application	Invite Sent to: [REDACTED]	lichtenlissriordan@llrlaw.com	12/08/2022 02:33:17 am UTC	12/08/2022 02:33:16 am UTC	73.68.107.230
SignNow Web Application	Viewed the Document	[REDACTED]	12/08/2022 02:56:24 am UTC	12/08/2022 02:56:24 am UTC	73.222.174.208
SignNow Web Application	Signed the Document	[REDACTED]	12/08/2022 02:57:38 am UTC	12/08/2022 02:57:38 am UTC	73.222.174.208
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